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fka CHRISTA SHEDD and
BRADLEY RANDALL

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

METROPOLITAN LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DAVID M. DOWNES, DANIEL R.
DOWNES, COLLEEN P. DOWNES,
KAREN A. MACAULAY, BRADLEY
RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS CHRISTA D.
SHEDD and BRADLEY RANDALL TO
RESPOND TO DEFENDANTS DAVID
M. DOWNES, DANIEL R. DOWNES,
COLLEEN P. DOWNES, AND KAREN
A. MACAULAY'S MOTION FOR
JUDICIAL NOTICE OF STATE OF
NEVADA, DISTRICT COURT'S (1)
STIPULATED DECREE OF DIVORCE,
AND (2) ORDER FROM MARCH 26,
2019 HEARING; ORDER**

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall may have additional time, up to and including May 3, 2023, within which to file their response/opposition to Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and (2) Order from March 26, 2019 Hearing [Doc. 21]. Defendants' response/opposition will be due on the same day that their response/opposition will be due on the pending Motion for Summary Judgment. Therefore, the last day for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall Defendant to file their response/opposition is May 3, 2013. Good cause exists for this

1 extension as the facts and issues are similar in both pending motions, and the pending Motion for
 2 Summary Judgement is based in part on the request for this Court to take judicial notice. This
 3 document is being electronically filed through the Court's ECF System. In this regard, counsel for
 4 Defendants Christa D. Shedd nka Christa Downes and Bradley Randall hereby attests that (1) the
 5 content of this document is acceptable to all persons required to sign the document; (2) Counsel for
 6 Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay
 7 Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this
 8 concurrence is available for inspection or production if so ordered.
 9

10 DATED this 14th day of April, 2023.

11 CLARK MCCOURT

12 /s/ Lukas B. McCourt

13 Brian P. Clark

14 Nevada Bar No. 4236

15 Lukas B. McCourt

16 Nevada Bar No. 11839

17 7371 Prairie Falcon Road, Suite 120

18 Las Vegas, NV 89128

19 *Attorneys for Defendants David R. Downes,*

20 *Daniel Downes, Colleen P. Downes, and*

21 *Karen A. Macaulay*

22 DATED this 14th day of April, 2023.

23 NEHME-TOMALKA AND ASSOCIATES

24 /s/ Doris Nehme-Tomalka

25 Doris Nehme-Tomalka

26 2620 Regatta Drive, Suite 102

27 Las Vegas, NV 89128

28 *Attorney for Defendant*

Christa Downes aka Christa Shedd

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED.**

Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall shall have up to and including May 3, 2023 to Defendant to file their response/opposition to Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and (2) Order from March 26, 2019 Hearing [Doc. 21).

DATED: April 17, 2023

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

**MIRANDA M. DU,
CHIEF UNITED STATES DISTRICT JUDGE**